

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Gonzalez et al.,

PLAINTIFFS,

14-CV-7487

- AGAINST -

(AKT)

Trees R US, Inc., et al.,

DEFENDANTS.

CASTONEDA et al.,

PLAINTIFFS,

16-CV-3162

- AGAINST -

(AKT)

Trees R US, Inc., et al.,

DEFENDANTS.

~~~~~

WHEREAS the parties have agreed  
to settle the above-captioned actions  
subject to a more formal  
settlement agreement, to include  
the following material terms.

1. DEFENDANTS agree to pay  
PLAINTIFFS, in SATISFACTION OF BOTH  
ACTIONS, the sum total of  
\$425,000.00 inclusive of Attorneys' Fees.



2. The settlement proceeds will be PAID PURSUANT TO ~~A~~ THE FOLLOWING PAYMENT SCHEDULE: THE FIRST payment, in the amount of \$50,000.00 shall be made on <sup>or before</sup> December 20, 2018; the next 12 monthly payments will be in the amount of \$10,000.00; the next 12 monthly payments will be in the amount of \$21,250.00. In the event that the COURT DOES NOT APPROVE OF THE settlement terms by December 20<sup>TH</sup>, 2018 Any settlement payments hereunder, including the December 20<sup>TH</sup> payment, will be withheld until such time AS THE COURT GRANTS ITS APPROVAL.

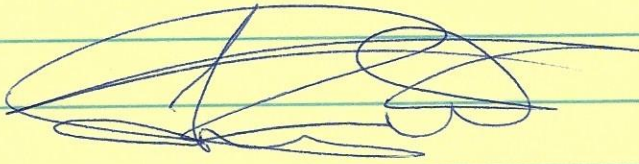


3. PLAINTIFFS Agree to execute a release IN FAVOR OF DEFENDANTS, subject to court approval, upon receipt of The settlement proceeds.

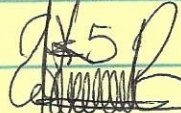
4 IN CONNECTION WITH THE PAYMENT SCHEDULE, DEFENDANTS (CORPORATE AND INDIVIDUAL) Agree to execute <sup>two</sup> ~~a~~ CONFESSIONS OF JUDGMENT ~~which~~ THAT DOUBLES THE AMOUNT OF THE ARREARS. BEFORE PLAINTIFFS seek to have the Confession OF JUDGMENT<sup>entered</sup>, they will provide DEFENDANTS' counsel with notice OF DEFAULT AND TEN DAYS TO CURE.



DATED: BROOKLYN, N.Y.  
November 2, 2018



TRACEY RECENELLO, DEFENDANTS  
INDIVIDUALLY AND ON BEHALF OF CORPORATION

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VIRGINIA POYBILLO William Anselmo

CARLOS ACOSTA

Pamela Long

Francisco

Juan Cortez

Antonio

Sergio Lopez

Sergio Lopez

S. [Signature]

Christian Castaneda

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JOSE B. HERDANDEZ

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MANUEL EGORIZALE